Limited Asbestos Survey Report



HEALTH & SAFETY • ENGINEERING • ENVIRONMENTAL

1553 West Todd Drive, Suite 201 ~ Tempe, AZ 85283 tel 480-460-8334 fax 480-460-8335 csceng.com

Presented To:

Barbara Wethington
Project Manager
Weston Solutions, Inc.
960 West Elliot Road, Suite 201
Tempe, Arizona 85284

Project:

Sun Chief Mill Site - Warehouse Southeast Corner of Arizona Highway 77 & US 70 Globe, AZ

CSC Project # 5002357

Inspection Dates: January 26-27, 2010

Report Date: February 23, 2010

TABLE OF CONTENTS

1. PROJECT SUMMARY	3
2. EXECUTIVE SUMMARY	4
3. ASBESTOS BULK SAMPLING METHODOLOGY	4
4. PLM ASBESTOS BULK ANALYSIS LABORATORY	5
5. PLM ASBESTOS BULK SAMPLE RESULTS	5
6. CONCLUSIONS	6
7. RECOMMENDATIONS	6
8. LIMITATIONS	7
8.1 Use by Third Parties	
9. SITE DIAGRAM	9
10. SITE PHOTOS	10

ATTACHMENTS:

ASBESTOS LAB PLM BULK RESULTS & CHAIN OF CUSTODY ASBESTOS LAB POINT COUNTING RESULTS & CHAIN OF CUSTODY AHERA BUILDING INSPECTOR CERTIFICATE



1. Project Summary

Project Name & Address: Limited Asbestos Survey

Sun Chief Mill Site - Warehouse

Southeast Corner of Highways 70 & 77

Globe, AZ

CSC Project Number: 5002357

Client: Barbara Wethington, Project Manager

Weston Solutions, Inc.

960 West Elliot Road. Suite 201

Tempe, Arizona 85284 Phone: 480-477-4900

Email: b.wethington@WestonSolutions.com

On Site Contact: Steve Kleinheider, Site Manager

Weston Solutions, Inc.

960 West Elliot Road, Suite 201

Tempe, Arizona 85284

Consultant: Clark Seif Clark, Inc. (CSC)

1553 West Todd Drive - Suite 201

Tempe, Arizona 85283 Phone: 480-460-8334 Fax: 480-460-8335

Project Manager: Derrick A. Denis, CIAQP, CAC, CIEC

AHERA Building Inspector: Robert E. Crawley

AHERA Building Inspector # E2412, Expires April, 2010

Inspection and sampling date: January 26-27, 2010

Report date: February 23, 2010

Limited Asbestos Survey Sun Chief Mill Site - Warehouse Southeast Corner of Highways 70 & 77, Globe, AZ CSC Project Number 5002357

2. Executive Summary

Barbara Wethington of Weston Solutions, Inc. retained Clark Seif Clark, Inc. (CSC) to perform a limited asbestos survey at the Sun Chief Mill Site located at the southeast corner of Arizona Highway 77 and US 70 near Globe, Arizona (referred to hereunder as the subject property). The survey was specific to the Warehouse.

On January 26 and 27, 2010 CSC industrial hygiene consultant and AHERA Building Inspector, Robert Crawley (#E2412 expires April, 2010) performed a visual inspection and collected asbestos bulk samples of suspect asbestos containing building materials within the warehouse that were readily accessible. A total of twenty-four (24) bulk asbestos samples of what appeared to be eight (8) homogeneous materials were collected from the warehouse for PLM analysis.

The analytical results indicate that the following building materials **DO contain asbestos**:

- o **Off-white Window Putty**; (<0.25% chrysotile asbestos via 400 Point Counting)
- o Black Roofing Mastic; 9-12% chrysotile

The analytical results indicate that the following building materials do **NOT** contain asbestos:

- o Drywall and Joint Compound Wall and Ceiling System
- o Clear Window Caulk w/ Black Weather Stripping and White Paint
- o Beige Paint
- o Concrete Foundation
- Brick and Mortar
- o Roofing Layers (excluding black roofing mastic)

3. Asbestos Bulk Sampling Methodology

Asbestos bulk samples were collected and placed in zip-lock bags for laboratory analysis. This sampling was performed to identify asbestos in specific suspect asbestos containing materials (ACM). The samples were submitted for standard turn around time analysis via polarized light microscopy (PLM).

The PLM method is the most commonly used method to analyze building materials for the presence of asbestos. The PLM method is in accordance with the EPA Interim Method of the Determination of Asbestos in Bulk Samples (EPA, July 1993). This method utilizes the optical properties of minerals to identify the selected constituent. The use of this method enables identification of the type and the percentage of asbestos in a sample.

The detection limit of the PLM method for asbestos identification is approximately one percent (1%) asbestos. CSC recommends Transmission Electron Microscopy (TEM) or Point Counting analysis for asbestos samples with trace, or less than one percent (<1%) when analyzed via PLM.



In some cases, samples collected from an apparently homogeneous material and yielding mixed results may, in fact, have been taken from different homogeneous materials displaying similar visual characteristics but composed of different constituents. Although materials may appear to be homogeneous, different manufacturers may have produced them in different batches. Materials, which appear to be homogeneous but yield mixed results, are typically assumed, in accordance with AHERA procedures, to be asbestos containing in all areas where the materials are located.

4. PLM Asbestos Bulk Analysis Laboratory

Collected asbestos bulk samples were submitted under chain of custody for standard turn around PLM analysis to CSC laboratory in Chatsworth, California. CSC laboratory is NVLAP (#200324) accredited for bulk (PLM) asbestos analysis.

Friable samples containing 2% or less asbestos (off-white window putty) were sent to LA Testing at 520 Mission Street in Pasadena, CA to be re-analyzed via EPA 600/R-93/116 (Quantitation using 400 Point Count Procedure). The beige paint samples were also sent to LA Testing in Pasadena CA to be re-analyzed by PLM. LA Testing is NVLAP accredited (Lab Code 200232-0) for PLM and point counting.

5. PLM Asbestos Bulk Sample Results

Positive samples identify building components as ACM. Asbestos containing materials are regulated materials. ACM scheduled for disturbance or in poor condition are subject to handling and disposal according to all local, state, and federal regulations.

On January 26-27, 2010, a total of twenty-four (24) bulk asbestos samples of what appeared to be eight (8) homogeneous materials were collected at the subject property for PLM analysis. Quantities of the asbestos containing material are estimations only.

The analytical results indicate that the following building materials **DO contain asbestos**:

- o Off-white Window Putty; < 0.25 % chrysotile asbestos via Point Counting
 - ~80 Square-feet
- o **Black Roofing Mastic**; 9-12% chrysotile
 - ~ 40 Square-feet

The analytical results indicate that the following building materials do **NOT** contain asbestos:

- o Drywall and Joint Compound Wall and Ceiling System
- o Clear Window Caulk w/ Black Weather Stripping and White Paint
- o Beige Paint
- o Concrete Foundation
- Brick and Mortar
- o Roofing Layers (excluding black roofing mastic)



6. Conclusions

- 1. Exterior Black Roofing Mastic (~ 40 square feet) contained 9-12% chrysotile asbestos. The material is considered category II non-friable ACM.
 - a. The north side of the roof remained covered in snow at the time of the investigation. It is possible that roofing patches exist under the snow, thereby increasing the quantity of black roofing mastic.
- 2. The off-white window putty was found to contain asbestos fibers (<0.25% Chrysotile).
 - a. Point Counting is the considered more accurate than PLM when quantifying asbestos content as the PLM method is an estimation. Therefore, reported asbestos quantities are those detected via Point Counting.
- 3. Category of asbestos may change due to the means employed by the contractor to remove ACM.

7. Recommendations

- 1. If suspect asbestos containing materials other than those tested are encountered, they must be assumed to contain asbestos or tested and proven otherwise.
- 2. Removal of category II non-friable ACM (black roofing mastic) throughout the subject property should only be performed by certified asbestos abatement workers.
 - a. Removal by hand means shall be considered class 2 work.
 - b. Removal by mechanical means shall render the asbestos RACM.
 - c. Workers performing said work should comply with all state, local and federal regulations.
- 3. Removal of the off-white window putty containing < 0.25% Chrysotile throughout the subject property should be considered unclassified work; therefore, the EPA NESHAPS regulations are not applicable to the beige paint or materials containing beige paint. However, OSHA regulates demolition or repairs of the friable materials that contain less than 1% asbestos. According to OSHA, work conducted in areas where the asbestos or asbestos product is below one percent is "unclassified asbestos work". For such "unclassified work", the employer still must follow the requirements in the OSHA Occupational Exposure to Asbestos standard 29 CFR 1926.1101(g)(1)(ii) and (iii), as well as the record keeping requirements under 29 CFR 1926.1101(n). In brief the standards require:
 - a. Worker training (awareness or greater)
 - b. Exposure assessment (air monitoring data during work)
 - c. If there is a potential to be exposed to greater than the PEL, a competent person needs to evaluate the job for the likelihood of exposure
 - d. Wet methods
 - e. Prompt cleanup
 - f. Disposal in leak tight containers (not necessarily bags)
 - g. HEPA vacuum
 - h. If the employer chooses to establish a negative exposure assessment, then 29 CFR 1926.1101(n) requires that the employer demonstrate that materials are not capable of releasing fibers of asbestos in concentrations at or above the permissible exposure limit and/or excursion limit under the expected conditions of handling. Also the employer shall establish and maintain an accurate record of objective data reasonably relied upon in support of the exemption. CSC can perform negative exposure assessment if needed.



Limited Asbestos Survey Sun Chief Mill Site - Warehouse Southeast Corner of Highways 70 & 77, Globe, AZ CSC Project Number 5002357

- 4. CSC should be contracted to write specifications prior to abatement and renovation activities at the subject property.
- 5. The contractor should be responsible for verifying locations and quantities of ACM.
- 6. A complete copy of this survey must be kept on site during asbestos abatement activities.

8. Limitations

The field observations, measurements, and research reported herein are considered sufficient in detail and scope to determine the asbestos content of the tested materials at the subject property. The assessment, conclusions, and recommendations presented herein are based upon specifically limited data. They do not represent all conditions at the subject property as they reflect the information gathered for specific building systems. CSC warrants the findings and conclusions contained herein have been promulgated in accordance with generally accepted industrial hygiene methodology and only for the site described in this report.

8.1 Use by Third Parties

This report was prepared pursuant to the contract CSC has with the client. That contractual relationship included an exchange of information about the subject property that was unique and between CSC and its client and serves as the basis upon which this report was prepared. Because of the importance of the communication between CSC and its client, reliance or any use of this report by anyone other than the client, for whom it was prepared, is prohibited and therefore not foreseeable to CSC.

Reliance or use by any such third party without explicit authorization in the report does not make said third party a third party beneficiary to CSC's contract with the client. Any such unauthorized reliance on or use of this report, including any of its information or conclusions, will be at third party's risk. For the same reasons, no warranties or representations, expressed or implied in this report, are made to any such third party.

8.2 Unidentifiable Conditions

This asbestos related environmental consulting report has been developed to provide the client with information regarding apparent conditions related to limited accessible building materials in the subject property. Although CSC believes that the findings and conclusions provided in this report are reasonable, the assessment is necessarily limited to the conditions observed and to the information available at the time of the work. Due to the nature of the work, there is a possibility conditions exist that could not be identified within the scope of the assessment or which were not apparent at the time of our site work. The assessment is also limited to information available from the client at the time it was conducted. It is also possible that the testing methods employed at the time of the report may later be superseded by other methods. CSC does not accept responsibility for changes in the state of the art.

Clark Seif Clark, Inc. does not guarantee that all contaminated areas in the subject property were recognized during our evaluation. This report is limited only to the samples taken and locations sampled. Additional sampling may be needed to further identify other pollutants, or other affected areas inside the property.



Limited Asbestos Survey Sun Chief Mill Site - Warehouse Southeast Corner of Highways 70 & 77, Globe, AZ CSC Project Number 5002357

We have employed state-of-the-art practices to perform this analysis of risk and identification, but this evaluation is limited in scope to the areas listed above. Our services consist of professional opinions and recommendations made in accordance with generally accepted engineering principles and practices, and are designed to provide an analytical tool to assist the client.

Clark Seif Clark or those representing Clark Seif Clark bear no responsibility for the actual condition of the structure or safety of a site pertaining to IAQ contamination regardless of the actions taken by the client.

Thank you for choosing Clark Seif Clark, Inc. to provide professional consulting services. If for some reason you have any questions regarding this report, please do not hesitate to contact us.

Thank you, Clark Seif Clark, Inc.

Written by,

Robert E. Crawley, CIEC

AHERA Building Inspector E2412,

Expires April, 2010

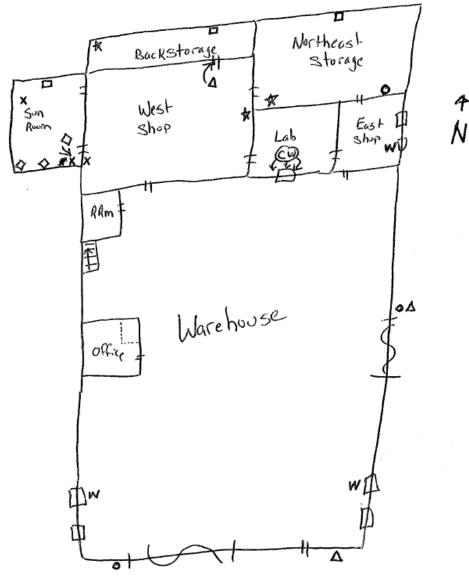
Reviewed and Approved by,

Paul V. Anderson, MS, CIEC

AHERA Building Inspector E2951

Expires June, 2010

9. Site Diagram



W = White Window Putty

* = Drywall and Joint Compound

= Beige faint

- Concrete

Block Wall and Mortar

X = Black Roof Mastic

(W) = Caulk + Weatherstripping



10. Site Photos



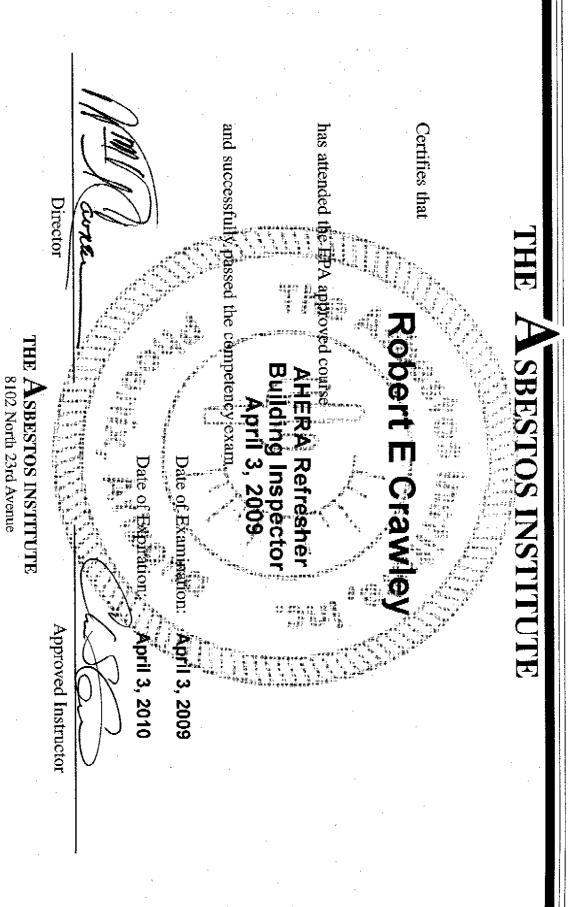
Photo 1: Warehouse – subject property south and east elevations



Photo 2: Warehouse – example of off-white window putty



Photo 3: Warehouse – black mastic positive for asbestos content occurs along the entire interface between lower roof and building (as indicated with the arrow) and around penetration points on other side of the roof

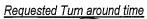


This training meets all requirements for asbestos accreditation under TSCA Title II.

Phoenix, AZ 85021-4962

Suite A

602-864-6564





Asbestos Bulk Sampling Chain of Custody

STANDARD RUSH

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Asbestos Bulk Sampling Chain of Custody

Requested Turn around time
STANDARD
RUSH

99005287 Sampling By # Samples Total Pages CSC Project # Page# Crawley Of 1-26-10 5772357 Project Name & Location Client Info: W:JI Wethington Building #: Warehouse Lab Submitted to: Material Description НМ Sample Location Condition Friability Quantity 'oncrete TBD Exterior exterior Block and Mortar TBD 16 18 Ġ Black Penetration Moto ~50 zp Penetration tarters HOMOGENEOUS CODE QUANTITY CODE CONDITION CODE HA= HOMOGENEOUS MATERIAL LF= Received by: · 阿钦 Received by: Relinguished By:





Asbestos Bulk Sample Analysis Summary [Performed by EPA 600/R-93/116 Method]

Page: 1 of 4

Globe, AZ

Project Site: Sun Chief Mill

CSC Project / Lab #: 99005287

Samples: 36

Sampling By: Robert Crawley

Date Sampled: 1/26/2010

Date Received: 2/2/2010

CSC Job Ref. ID: 5002357

Client Name: Weston Solutions, Inc. (5000786)

Date Reported: 2/5/2010

Barbara Wethington

Department: Project Manager

Suite 201

960 West Elliot Road Tempe, AZ 85284

Client ID#	Lab	Material Description	Location	Asbestos Type & %	Fibrous Non-Asbestos	Nonfibrous Non- Asbestos
2357 B-1	5287-1	Drywall White	Warehouse - NE Storage, SW Ceiling	ND	16% Cellulose	84% Matrix Material
2357 B- 1A	5287-2	Joint Compound White	Warehouse - NE Storage, SW Ceiling	ND	3% Cellulose	97% Matrix Material
2357 B-2	5287-3	Drywall White	Warehouse - W Shop, E Wall	ND	15% Cellulose	85% Matrix Material
2357 B- 2A	5287-4	Joint Compound White	Warehouse - W Shop, E Wall	ND	2% Cellulose	98% Matrix Material
2357 B-3	5287-5	Drywall White	Warehouse - Back Storage, N Wall	ND	15% Cellulose	85% Matrix Material
2357 B- 3A	5287-6	Joint Compound White	Warehouse - Back Storage, N Wall	ND	2% Cellulose	98% Matrix Material
2357 B-4	5287-7	Window Putty Off White	Warehouse - E Wall	2% Chrysotile	ND	98% Matrix Material
2357 B-5	5287-8	Window Putty Off White	Warehouse - W Wall	2% Chrysotile	ND	98% Matrix Material
2357 B-6	5287-9	Window Putty Off White	Warehouse - E Shop, E Wall	2% Chrysotile	ND	98% Matrix Material
2357 B-7	5287-10	Caulk Clear	Warehouse - Lab, S Window	ND	ND	100% Matrix Material

CSC Project / Lab #: 99005287

Address: Globe, AZ

Client ID#	Lab Sample #	Material Description	Location	Asbestos Type & %	Fibrous Non-Asbestos	Nonfibrous Non- Asbestos
2357 B- 7A	5287-11	Weather Stripping Black	Warehouse - Lab, S Window	ND	ND	100% Matrix Material
2357 B- 7B	5287-12	Paint White	Warehouse - Lab, S Window	ND	ND	100% Matrix Material
2357 B-8	5287-13	Caulk Clear	Warehouse - Lab, S Window	ND	ND	100% Matrix Material
2357 B- 8A	5287-14	Weather Stripping Black	Warehouse - Lab, S Window	ND	ND	100% Matrix Material
2357 B- 8B	5287-15	Paint White	Warehouse - Lab, S Window	ND	ND	100% Matrix Material
2357 B-9	5287-16	Caulk Clear	Warehouse - Lab, S Window	ND	ND	100% Matrix Material
2357 B- 9A	5287-17	Weather Stripping Black	Warehouse - Lab, S Window	ND	ND	100% Matrix Material
2357 B- 9B	5287-18	Paint White	Warehouse - Lab, S Window	ND	ND	100% Matrix Material
2357 B-10	5287-19	Paint Beige	Warehouse - NE Storage, S Interior Wall	ND	ND	100% Matrix Material
2357 B-11	5287-20	Paint Beige	Warehouse - Exterior, E Wall	ND	ND	100% Matrix Material
2357 B-12	5287-21	Paint . Beige	Warehouse - Exterior, S Wall	ND	ND	100% Matrix Material
2357 B-13	5287-22	Concrete Light Gray	Warehouse - Back Storage, S	ND	1% Cellulose	99% Matrix Materia
2357 B-14	5287-23	Concrete Light Gray	Warehouse - Exterior, S	ND	2% Cellulose	98% Matrix Materia
2357 B-15	5287-24	Concrete Light Gray	Warehouse - Exterior, E	ND	2% Cellulose	98% Matrix Materia

CSC Project / Lab #: 99005287

Address: Globe, AZ

Client ID#	Lab : Sample #	Material Description	Location	Asbestos Type & %	Fibrous Non-Asbestos	Nonfibrous Non- Asbestos
2357 B-16	5287-25	Block and Mortar Gray/Dark Pink	Warehouse - Back Storage	ND	ND	100% Matrix Material
2357 B-17	5287-26	Block and Mortar Gray/Dark Pink	Warehouse - NE Storage	ND	ND	100% Matrix Material
2357 B-18	5287-27	Block and Mortar Gray/Dark Pink	Warehouse - Sun Room	ND	ND	100% Matrix Material
2357 B-19	5287-28	Penetration Mastic Black	Warehouse - Sun Room Penetration	10% Chrysotile	3% Glass Fibers	87% Matrix Material
2357 B-20	5287-29	Penetration Mastic Black	Warehouse - Sun Room, S Flashing	12% Chrysotile	2% Glass Fibers	86% Matrix Material
2357 B-21	5287-30	Penetration Mastic Black	Warehouse - Sun Room, S Flashing	9% Chrysotile	3% Glass Fibers	88% Matrix Material
2357 B-22	5287-31	Pebbled Roofing Layer Brown	Warehouse - Sun Room, SW	ND	70% Glass Fibers	30% Matrix Material
2357 B- 22A	5287-32	Roofing Layer Black	Warehouse - Sun Room, SW	ND	80% Glass Fibers, Cellulose, Synthetic	20% Matrix Material
2357 B-23	5287-33	Pebbled Roofing Layer Brown	Warehouse - Sun Room, S Center	ND	70% Glass Fibers	30% Matrix Material
2357 B- 23A	5287-34	Roofing Layer Black	Warehouse - Sun Room, S Center	ND	80% Glass Fibers, Cellulose, Synthetic	20% Matrix Material
2357 B-24	5287-35	Pebbled Roofing Layer Brown	Warehouse - Sun Room, SE	ND .	70% Glass Fibers	30% Matrix Material
2357 B- 24A	5287-36	Roofing Layer Black	Warehouse - Sun Room, SE	ND	80% Glass Fibers, Cellulose, Synthetic	20% Matrix Material

Page: 4 of 4

CSC Project / Lab #: 99005287

Address: Globe, AZ

Lab Asbestos Fibrous Nonfibrous Non-Client ID # Sample # Material Description Location Type & % Non-Asbestos Asbestos

Bulk Material Analysis:

Bulk samples are examined by Polarized Light Microscopy (PLM) with Dispersion Staining as recommended by the U.S. Environmental Protection Agency (EPA).

Results:

Results are reported as a percent(%) of total asbestos present for each asbestos type identified within each distinguishable layer, or sub-sample, of a sample. Other non-asbestos materials may also be identified.

Explanation:

Reported results are a visual estimate by area of asbestos concentration. Results for heterogeneous samples examined by component are reported as a composite. The lower limit of reliable detection for the PLM methods is 1%. Samples which contain asbestos in a concentration lower than the limit of reliable detection (<1%) commonly referred to as "trace" are reported as "<1%". Trace is defined as reproducible detection levels of asbestos with at least five fibers spread over three slides, per NIST Proficiency Test instructions. Samples in which no asbestos is observed are reported as ND (None Detected). Note: When ND appears on a report, it means that asbestos was not observed and that, if present, it exists in concentrations of <1% and/or fiber dimensions are too small for accurate microscopic resolution. CSCL is accredited by the National Voluntary Laboratory Accreditation Program for the specific scope of accreditation under NVLAP Lab Code 200324. Results reported relate only to sample(s) submitted and tested and do not necessarily apply to other apparently identical or similar materials. This report is submitted for the exclusive use of the client to whom it is addressed. Any reproduction of this report or use of this Laboratory's name for advertising or publicity purposes without prior written authorization is prohibited. In addition, this report is not to be used to claim product endorsement by NVLAP or any agency of the U.S. Government.

Clay Egner Christian Goerrissen
Laboratory Analyst Laboratory Analyst/Manager

Note: Our policy is to dispose of samples unless written notification is received in our office within 30 days of this report.



LA Testing

520 Mission Street, South Pasadena, CA 91030

Phone: (323) 254-9960 Fax: (323) 254-9982 Email: pasadenalab@latesting.com

Attn: Robert Crawley
Clark Seif Clark, Inc.
1553 W Todd Drive - Suite201

Customer ID: Customer PO:

32CLAR63

Received:

02/19/10 12:00 PM

LA Testing Order:

321002042

Tempe,, AZ 85283 Fax: (480) 460-8335

(480) 460-8335 Phone: (480) 460-8334

Project: 5002357 / Warehouse / Sun Chief Mill Globe, AZ

LA Testing Proj:

LA resulty Floj

Analysis Date: 2/22/2010

Test Report: Polarized Light Microscopy (PLM) - Point Count Performed by EPA 600/R-93/116 Method with Gravimetric Reduction and 400 Point Count

SAMPLE ID	DESCRIPTION	I APPEARANCE	٠,	Matrix ic Acid	_	ESTOS TYPES	NON- ASBESTOS % Fibrous	NON- ASBESTOS % NON-FIBROUS
4 321002042-0001	Warehouse E wall	Gray Non-Fibrous Homogeneous	4.0	90.2	<0.25	Chrysotile		5.8 Non-fibrous (other)
5 321002042-0002	Warehouse W wall	Gray Non-Fibrous Homogeneous	6.6	88.2	<0.25	Chrysotile		5.2 Non-fibrous (other)
6 321002042-0003	E shop E wall	Gray Non-Fibrous Homogeneous	6.5	91.1	<0.25	Chrysotile		2.4 Non-fibrous (other)

Analyst(s)	
Roger Casillas (3)	

Derrick Tanner, Laboratory Manager or other approved signatory

Disclaimers: Some samples may contain asbestos fibers present in dimensions below PLM resolution limits. LA Testing. suggests that samples reported as <0.25% or none detected undergo additional analysis via TEM. The above test report relates only to the items tested. This report may not be reproduced, except in full, without written approval by LA Testing. This report must not be used to claim product endorsement by NVLAP or any agency of the United States Government. LA Testing bears no responsibility for sample collection activities, analytical method limitations, or the accuracy of results whin requested to separate layer samples. LA Testing. liability is limited to the cost of sample analysis. Samples received in good condition unless otherwise noted.

Samples analyzed by LA Testing 520 Mission Street, South PasadenaCA $\,$

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a-22-10 Afternoon

Requested Turn around time



Asbestos Bulk Sampling Chain of Custody

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Adrenos (80) 2/19/10